

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 21-cv-10928

Honorable Denise Page Hood

vs.

\$3,840,772.58 U.S. dollars constituting
125 international wire transfers seized
from U.S. correspondent bank, Citibank,
between December 21, 2020 and
January 4, 2021, *et al.*,

Defendants *in rem*.

**MOTION FOR ORDER TO FILE UNDER SEAL *EX PARTE*
DECLARATION IN SUPPORT OF STATUS REPORT**

NOW COMES the United States of America, DAWN N. ISON, United States Attorney, by and through GJON JUNCAJ, Assistant United States Attorney, and, in support of this Motion states that:

1. This Motion is submitted in conjunction with a court ordered 90-day Status Report and sworn *Ex Parte* Declaration in Support of Status Report. (ECF No. 140, Order to Stay and for 90-day Status Reports).

2. Pursuant to 18 U.S.C. § 981(g), the court concluded a stay was required in these proceedings and further ordered the government to file 90-day status reports as to the necessity of continuing the stay. The filing of an *ex parte* declaration of a law enforcement officer in support of the Status Report, made in

support of a statutory stay, is expressly authorized by 18 U.S.C. § 981(g)(5). *See United States v. \$716,502.44*, 2008 WL 5158291, *5 (E.D. Mich. Dec. 5, 2008) (relying on affidavit filed *ex parte* and under seal to stay proceedings); *United States v. \$144,001 in U.S. Currency*, 2010 WL 1838660, *1 (N.D. Cal. May 3, 2010) (plain language of § 981(g)(5) permits government to submit evidence in support of its motion to stay *ex parte* and under seal).

Wherefore, the United States respectfully requests that this Honorable Court grant this request to seal the Ex Parte Declaration in Support of Status Report from all public review until further order of this Court.

Respectfully submitted,

DAWN N. ISON
United States Attorney

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Dated: December 5, 2023

CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2023 the above document was electronically filed with the Court via the ECF system which will send notification of such filing to all ECF filers.

Respectfully submitted,

DAWN N. ISON
United States Attorney

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